



SEALED

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FILED
SEP 26 2022
U.S. MAGISTRATE JUDGE
BY _____

7 UNITED STATES DISTRICT COURT
8 DISTRICT OF NEVADA

9 UNITED STATES

10 Case No. 2:22-MI- 756 -VCF

11 v.

12 SABIR PHILIMON

13 APPLICATION TO SEAL

14 (UNDER SEAL)

15 The United States of America, by and through the undersigned, respectfully moves
16 this Honorable Court for an Order sealing the Complaint, Warrant, this Application, and
17 this Court's Sealing Order, in the above-captioned matter, until such time as this Honorable
Court, or another Court of competent jurisdiction, shall order otherwise. In support of this
Application, the government submits as follows.

18 According to Title 18, United States Code, Section 3103a(b)(1) the court may delay
19 any notice required, or that may be required, if there is reasonable cause to believe that
20 providing immediate notification of the execution of the warrant may have an adverse result.
21 In this case, such an order would be appropriate because the attached Complaint relates to a
22 defendant who is currently on supervised release under case number 2:12-cr-0109-APG-
23 PAL. The defendant was convicted by plea of one count of conspiracy to interfere with

1 commerce by robbery, three counts of interference with commerce by robbery, and one count
2 of brandishing a firearm in furtherance of a crime of violence. Should the defendant become
3 aware of a warrant for his arrest there is a significant potential that he would flee.

4 DATED this 23rd day of September 2022.

5 Respectfully submitted,

6 JASON M. FRIERSON
7 United States Attorney
8 District of Nevada

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10 ROBERT KNIEF
11 Assistant United States Attorney

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SEP 26 2022

UNITED STATES DISTRICT COURT U.S. MAGISTRATE JUDGE
DISTRICT OF NEVADA

UNITED STATES

V.

SABIR PHILIMON

Case No. 2:22-MJ- 756 -VCF

ORDER TO SEAL

(UNDER SEAL)

Based on the pending Application of the Government, and good cause appearing therefor, **IT IS HEREBY ORDERED** that the Complaint, the Government's Application to Seal, and this Court's Sealing Order in the above-captioned matter shall be sealed until further Order of the Court.

DATED this 8 day of September 2022.

W. Müller

HON. CAM FERENBACH
UNITED STATES MAGISTRATE JUDGE